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PROPOSED COUNSEL FOR DEBTORS AND DEBTORS-IN-POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

**GGI HOLDINGS, LLC, *et al.*,
DEBTORS.¹**

§ CASE NO. 20-31318-hdh11

§

§ CHAPTER 11

§

§ (Joint Administration Requested)

§

**AGENDA FOR FIRST DAY HEARING ON
MAY 6, 2020 AT 2:30 P.M. CENTRAL**

**A. MOTION FOR ORDER DIRECTING JOINT ADMINISTRATION OF
CHAPTER 11 BANKRUPTCY CASES [ECF NO. 6];**

Status: Going forward.

Related Documents:

1. Proposed Order.

¹ The debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GGI Holdings, LLC (1222); Gold's Gym International, Inc. (3614); Gold's Holding Corp. (3610); Gold's Alabama, LLC (0520); Gold's Gym Franchising, LLC (5009); Gold's Gym Licensing, LLC (5013); Gold's Gym Merchandising, LLC (4892); Gold's Gym Rockies, LLC (7129); Gold's Louisiana, LLC (9825); Gold's North Carolina, LLC (3221); Gold's Ohio, LLC (4396); Gold's Oklahoma, LLC (7577); Gold's St. Louis, LLC (4827); Gold's Southeast, LLC (9382); and Gold's Texas Holdings Group, Inc. (8156). The Debtors' mailing address is 4001 Maple Avenue, Suite 200, Dallas, Texas 75219.

B. NOTICE OF DESIGNATION OF COMPLEX CHAPTER 11 BANKRUPTCY CASES [ECF NO. 7];

Status: Going forward.

Related Documents:

1. Proposed Order.

C. DEBTORS' APPLICATION FOR ORDER APPOINTING BMC GROUP, INC. AS CLAIMS, NOTICING, SOLICITATION, AND ADMINISTRATIVE AGENT [ECF NO. 19];

Status: Going forward.

Related Documents:

1. Proposed Order.
2. BMC Group, Inc. Engagement Letter [Exhibit 1 to Exhibit A to ECF No. 19].
3. Declaration of Tinamarie Feil in support of Application [Exhibit B to ECF No. 19].

D. MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER (A) AUTHORIZING THE DEBTORS TO REMIT AND PAY SALES, USE, AND FRANCHISE TAXES AND CERTAIN OTHER GOVERNMENT CHARGES AND (B) APPROVING RELATED RELIEF [ECF NO. 15];

Status: Going forward.

Related Documents:

1. Proposed Order.

E. DEBTORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE DEBTORS TO (I) PAY PRE-PETITION WAGES, SALARIES, OTHER COMPENSATION, REIMBURSABLE EXPENSES, WITHHOLDINGS, AND DEDUCTIONS AND (II) CONTINUE EMPLOYEE BENEFITS PROGRAMS [ECF NO. 10];

Status: Going forward.

Related Documents:

1. Proposed Order.

F. DEBTORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE DEBTORS TO HONOR CERTAIN PRE-PETITION OBLIGATIONS TO CUSTOMERS AND TO OTHERWISE CONTINUE IN THE ORDINARY COURSE OF BUSINESS THEIR CUSTOMER PROGRAMS AND PRACTICES [ECF NO. 11];

Status: Going forward.

Related Documents:

1. Proposed Order.

G. DEBTORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE DEBTORS TO OPERATE THE CASH MANAGEMENT SYSTEM, MAINTAIN EXISTING BANK ACCOUNTS AND BUSINESS FORMS, AND CONTINUE TO PERFORM INTERCOMPANY TRANSACTIONS [ECF NO. 12 / 23];

Status: Going forward.

Related Documents:

1. Proposed Order.
2. Debtors' Bank Accounts [Exhibit B to ECF No. 23].

H. DEBTORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE DEBTORS TO PAY PRE-PETITION CLAIMS OF CRITICAL VENDORS [ECF NO. 13];

Status: Going forward.

Related Documents:

1. Proposed Order.
2. Amended Critical Vendors List [Debtors' Exhibit 4].

I. DEBTORS' OMNIBUS MOTION FOR ENTRY OF AN ORDER AUTHORIZING (I) REJECTION OF CERTAIN UNEXPIRED NON-RESIDENTIAL REAL PROPERTY LEASES AND (II) ABANDONMENT OF CERTAIN PERSONAL PROPERTY REMAINING ON THE PREMISES COVERED BY THE LEASES EFFECTIVE NUNC PRO TUNC TO THE PETITION DATE [ECF NO. 16];

Status: Going forward.

Related Documents:

1. Proposed Order.
 2. List of Leases to be Rejected [Annex 1 to ECF No. 16].
- J. MOTION FOR ORDER UNDER BANKRUPTCY CODE SECTIONS 105(A), 363(B)&(F) AND 365(A) AND BANKRUPTCY RULES 6001, 6003, 6004 AND 6006, AUTHORIZING THE DEBTORS TO ASSUME CERTAIN AGREEMENTS CONCERNING THE SALE, ASSIGNMENT AND TRANSFER OF CLUB-RELATED ASSETS FREE AND CLEAR OF LIENS, CLAIMS AND ENCUMBRANCES [ECF NO. 18];**
- Status: Going forward.

Related Documents:

1. Proposed Order.
2. Asset Purchase Agreement and Membership Draft Purchase Agreements [Exhibits B-1 through B-6 to ECF No. 18].

- K. MOTION FOR INTERIM AND FINAL AUTHORITY FOR THE DEBTORS TO USE CASH COLLATERAL, OBTAIN DEBTOR IN POSSESSION FINANCING, DETERMINING ADEQUATE PROTECTION, SUPERPRIORITY CLAIM AND LIENS, AND GRANTING RELATED RELIEF [ECF NO. 21].**

Status: Going forward.

Related Documents:

1. Proposed Order.
2. DIP Budget [Exhibit 1 to ECF No. 21].
3. Checklist [ECF No. 22].

Dated: May 5, 2020

Respectfully submitted,

DYKEMA GOSSETT PLLC

By: /s/ Aaron M. Kaufman

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**PROPOSED COUNSEL FOR DEBTORS
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 5th day of May, 2020, a true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system.

/s/ Danielle N. Rushing

Danielle N. Rushing